

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STEPHEN ELLIOTT,

*Plaintiff,*

- against -

MOIRA DONEGAN, and JANE DOES (1–30),

*Defendants.*

**Oral Argument Requested**

No. 1:18-cv-05680-LDH-SJB

**DECLARATION OF JOSHUA MATZ**

JOSHUA MATZ declares as follows:

1. I am a partner at the law firm of Kaplan Hecker & Fink LLP and am counsel for Defendant Moira Donegan in this action.
2. I respectfully submit this declaration in further support of Ms. Donegan’s Motion for Targeted Summary Judgment Based on Immunity Under the Communications Decency Act, 47 U.S.C. § 230.
3. The purpose of this declaration is to identify exhibits and other documents being presented to this Court in support of defendant’s motion.
4. Attached hereto as Exhibit A is the Affidavit of Moira Donegan dated August 13, 2020.
5. Attached hereto as Exhibit B is the transcript of the Deposition of Moira Donegan taken on January 14, 2021 at 2:10 p.m.
6. Attached hereto as Exhibit C is DONEG00000029, a draft of an article emailed by Ms. Donegan on January 2, 2018.

7. Attached hereto as Exhibit D is DONEG000000053, an email chain between Ms. Donegan and another person on October 11, 2017.

8. Attached hereto as Exhibit E is DONEG000000054, an email chain between Ms. Donegan and another person on October 11, 2017.

9. Attached hereto as Exhibit F is DONEG000000228, an email chain between Ms. Donegan and another person on October 11, 2017.

10. Attached hereto as Exhibit G is DONEG000000226, an email chain between Ms. Donegan and another person on October 12, 2017.

11. Attached hereto as Exhibit H is the Supplemental Affidavit of Moira Donegan dated November 17, 2020.

12. Attached hereto as Exhibit I is a letter from Nicholas Lewis to Joshua Matz (ECF 80-6) dated December 29, 2020.

In accordance with 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed at: New York, New York  
March 22, 2021

  
Joshua Matz